

Parenthood affiliates, and other ancillary organizations such as Planned Parenthood Texas Votes (“PPTV”).

The State first questioned Affiliate Defendants’ sweeping claims of privilege on October 11, 2022. Affiliates responded with a six-page letter affirming their claims of privilege. Subsequent deposition testimony from the CEO and President of PPGT, Affiliate PPST’s corporate representative, and two PPFA corporate representatives has revealed there is no legitimate basis for the privilege as claimed. The PPFA corporate representatives’ depositions concluded on November 29, 2022, with the unequivocal testimony that PPFA did not have an attorney-client relationship with L&L concerning the litigation related to the termination of Affiliate Defendants from Texas Medicaid. The next day, the State requested Defendants make full production of the non-privileged communications the State identified. Despite efforts to reach an agreement, the parties remain opposed. The State respectfully requests the Court order expedited briefing on this issue so that Texas has an opportunity to review these documents before the summary judgment deadline.

CONCLUSION

The State respectfully requests that the Court grant its Motion for Expedited Briefing. The State proposes the Court order Defendants to respond to the State’s Motion to Compel by December 19, 2022 and the State to file any reply on December 20, 2022.

Dated: December 15, 2022

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I certify that counsel for the State of Texas has conferred with counsel for Defendants. Defendants oppose this Motion for Expedited Briefing.

/s/ Christopher D. Hilton

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed electronically via CM/ECF on December 15, 2022, causing electronic service on all counsel of record.

/s/ Christopher D. Hilton

CHRISTOPER D. HILTON